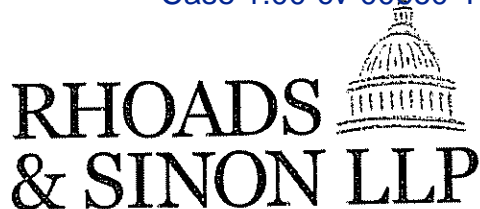


EXHIBIT B



Dean F. Piermattei
ph (717) 233-5731
fx (717) 231-6637
dpiermattei@rhoads-sinon.com

FILE NO: 6216.5

June 4, 2007

Re: Stambaugh v. SARAA

Jordan D. Cunningham
Cunningham & Chernicoff, P.C.
2320 N. 2nd Street
Harrisburg, PA 17110

Dear Jordan:

Please consider this a formal response to your outstanding discovery request. Specifically, I am providing to you, in response to your discovery request, the documents you identified on your handwritten sheet after reviewing the same in our office on May 30th and 31st. I am enclosing a copy of your handwritten sheet as well as the documents being produced in response to your request.

Additionally, there was an inadvertent disclosure of certain confidential documents to you during your review of last week. The following documents have been removed from production: 3704, 3714, 3766 – 69, 3994, and 4303 – 04.

Additionally, I am again renewing my request that you provide me all financial data for your client as it relates to his claim for damages. I have requested this several times and the documents you produced to me to date are insufficient with respect to this request.

Very truly yours,

RHOADS & SINON LLP

By: 

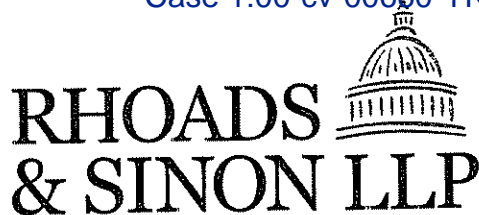
Dean F. Piermattei

Enclosure

June 4, 2007

Page 2

Bcc: Tim Edwards
Dave Holdsworth
Dave Fleet
Bob Duncan
Valerie Hennessy
Marisa Roitman
David McIntosh



Dean F. Piermattei
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dpiermattei@rhoads-sinon.com

FILE NO: 62165

June 6, 2007

Re: Stambaugh v. SARAA

Jordan D. Cunningham
Cunningham & Chernicoff, P.C.
2320 N. 2nd Street
Harrisburg, PA 17110

VIA E-Mail: jdc@cclawpc.com

Dear Jordan:

I am receipt of your letter dated June 1, but which I have just received today, June 6th. I strongly disagree with the scenario which you have set forth in your letter. With respect to Answers to Interrogatories, I had previously advised you that one of the key participants for answering the Interrogatories has been out of the country and will be returning on June 18th. I did however, provide you with the names of primary witnesses who are also parties in this case. Plaintiff has been fully aware of this information for over a year and you have taken no steps to depose any of these individuals. At a minimum, I would expect that Plaintiff would have deposed these people if for no other reason than they are defendants in this case. Accordingly, do not blame me for the late notice of depositions.

Moreover, you have intimated that the "additional box of documents" of which I informed you yesterday was somehow previously and improperly withheld from you. To the contrary, I had my client review its files once again based on your request for additional documentation. Frankly, most or all of the documents contained in the supplemental production are irrelevant. Notwithstanding, I am making these documents available for review

It is imperative that I remind you that Plaintiff's claims was initially filed in 2000. In the past 7 years, all of the individual Defendants have ceased involvement with SARAA and there have been administrative changes that make the collection of documents and information extremely difficult. Defendants have produced almost 9,000 documents in this case, all of which I believe are responsive to requests for production. To the extent that we do not have a document, it is either because it cannot be located. There have been no attempts to hide any information.

Finally, while your requests for financial information from SARAA is irrelevant (SARAA has not made a claim in this case), I have agreed to produce such information as soon as possible.

In contrast to the 9,000 documents that Defendants have produced, Plaintiff's responses have been woefully inadequate. Most documents that you have produced are pleadings or filings associated with the litigation. Notwithstanding a multi-million dollar damages claim and assertions that you have had a financial expert looking at this case for months, some of your

June 6, 2007

Page 2

client's financial information was produced for the first time yesterday. Moreover, Plaintiff has not even begun to answer our discovery requests on the following topics:

1. You have a claim for a business evaluation in excess of \$5 million yet you have produced no documentation on this issue;
2. You have a claim for expenses associated with removing operations from the airport in excess of \$1 million yet there is no information on this item;
3. You have a claim for loss of income totaling \$13 million yet you have produced no documentation on this item;
4. You have a claim for \$1.5 million for business interruption, yet you have produced no information on this item;
5. You have a claim for \$3 to 5 million dollar lost productivity, yet you have produced no information on this item;
6. You have a claim for \$30 million to construct a new facility, yet you have produced any information on this claim.

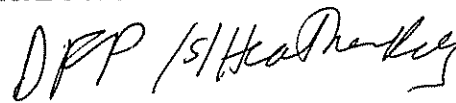
If the information is not immediately forthcoming, I will file a motion to compel with the Court as we must have this information prior to the close of discovery. Your client made these claims over seven years ago, and you would surely have enough time in those seven years to collect this information.

Finally, with respect to depositions, I previously informed you that David Fleet will be available for deposition on June 14th. David McIntosh, however, is recuperating from surgery and will not be available until the last week of June. Likewise, David Holdsworth returns to the country on the 18th and I am attempting to secure a date for his deposition. He obviously will not be in the country and cannot attend a deposition on the 13th or 14th.

As you know, I am obviously willing to work with you on the scheduling of discovery, however, you must begin producing information to support the claims as we have requested sometime ago.

Very truly yours,

RHOADS & SINON LLP

By: 

Dean F. Piermattei



Heather Z. Kelly

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hkelly@rhoads-sinon.com

FILE NO: 6216/5

June 12, 2007

Re: Stambaugh v. SARAA

Jordan D. Cunningham
Cunningham & Chernicoff, P.C.
2320 N. 2nd Street
Harrisburg, PA 17110

Dear Jordan:

Enclosed are the documents that you requested following your review of the documents Bates numbered SARAA 06814-07167. This will confirm that you have now reviewed documents SARAA 00001-07167, and we have produced all of the documents contained on your handwritten lists (copies enclosed). Additionally, via e-mail earlier today, I provided you with SARAA's audited consolidated financial reports for the years 2000 through 2006. Accordingly, SARAA has produced every document that it has been able to locate that is responsive to your document requests.

In contrast, we are still awaiting documents from your clients, as outlined in Dean Piermattei's June 6, 2007 correspondence. As I indicated in my e-mail yesterday, we need such documents by the close of business Friday, or we will contact the Court regarding the same.

Thank you for your prompt attention these matters.

Very truly yours,

RHOADS & SINON LLP

By:

Heather Z. Kelly

Enclosure

cc: Dean Piermattei, Esq.

Heather Z Kelly/RandS

06/12/2007 06:40 AM

To jcunningham@cclawpc.com

cc Dean F Piermattei/RandS@RandS

bcc Deb McKinney/RandS

Subject Stambaugh v. SARAA (2001 to 2006 Audited consolidated financial statements)

Jordan:

Attached are 2001 to 2006 audited consolidated financial statements from SARAA. The 2000 figures are contained in the 2001 report by way of comparison. Please confirm receipt of these documents.

I hope that you have had the opportunity to (re-)review the correspondence from Dean and the allegations in the Second Amended Complaint regarding Plaintiff's unsupported categories of damages. If we do not have documents supporting any or all of these categories of documents by the end of the week, we will have to contact the Court.

Thank you,

Heather Z. Kelly, Esq.
Rhoads & Sinon LLP
1 South Market Square
P.O. Box 1146
Harrisburg, PA 17108-1146
(717) 237-6732 (phone)
www.rhoads-sinon.com



2006 report final.pdf



2005 KPMG report final.pdf



SARAA's Final 2004 financial from KPMG.pdf



2003 Annual Report- final.pdf



2002 Annual Report from KPMG.pdf



2001 Annual Report from KPMG.pdf

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Any person reviewing this information, other than the intended recipient, is expressly advised to consult with their own independent tax advisor with respect to any tax advice contained herein."



Deb McKinney/RandS
06/18/2007 05:07 PM

To jdc@cclawpc.com
cc Dean F Piermattei/RandS@RandS
bcc tedwards@saraa.org; dfleet@aerofinity.com;
dmci2@comcast.net; bduncan@BAAI.com;
v_hennessey@baausa.com; david.rettig@aig.com
Subject Stambaugh v. SARAA

SENT ON BEHALF OF DEAN PIERMATTEI, ESQ.

Dear Jordan,

I am writing as a follow-up to our discussion today during Mr. Tate's deposition to reiterate that Mr. Testa and Ms. Svirbely will most likely be called in our case in chief. For that matter, all of the witnesses identified by my associate, Heather Kelly, should be considered as potential direct witnesses, although they could only be called in rebuttal. I am making all of these witnesses available to you for a deposition and I will work with you to schedule convenient times. Please advise to me if you have a desire to depose any of these witnesses.

With respect to Mr. Testa, he is not available from June 20th through the 29th as he is on vacation. He will however, be in the Harrisburg area subsequent to the 29th and he will be available for deposition.

With respect to your damage documentation, again, I understand that you are working with Mr. Stambaugh to produce the requested documents, however, I must have documentation as soon as possible as we discussed. It is my understanding that you will continue to work with Mr. Stambaugh to produce documentation, if it exists, to support any claim in the Complaint for damages and as referenced in your Answers to Interrogatories. To the extent that Mr. Stambaugh does not have the documentation to you and that you do not provide it to me prior to any of the depositions, it is my understanding that you will also allow me to re-depose these individuals beyond the discovery deadline to follow-up on this issue. If my understanding is in any way incorrect, please let me know. Finally, it is my understanding that the claim for construction of the facilities has been dropped.

Thank you for your cooperation in this matter.

/s/ Dean F. Piermattei

Debby McKinney
Secretary to Dean Piermattei, Esq.
and Cory Iannacone, Esq.
Rhoads and Sinon LLP
717-237-6780



Deb McKinney/RandS

06/22/2007 08:40 AM

To jdc@cclawpc.com

cc Dean F Piermattei/RandS@RandS

bcc BelindaS@saraa.org; FredT@saraa.org;
dfleet@aerofinity.com; dmci2@comcast.net;
bduncan@BAAI.com; david.holdsworth@adra.org

Subject Stambaugh v. SARAA

SENT ON BEHALF OF DEAN PIERMATTEI, ESQ.

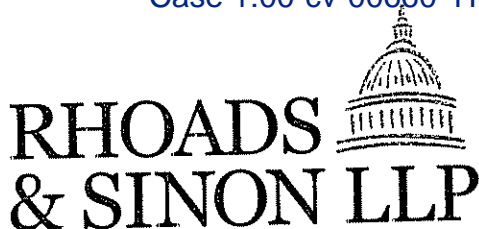
Dear Jordan,

I was expecting a call from you regarding outstanding discovery issues. Specifically, please advise whether you will be wanting to take the depositions of Fred Testa, Tom Peiffer (who we discussed during the deposition of Mr. Fleet and who would testify regarding rent payment) and Belinda Svirebely. Also, we will most likely be calling someone from Aero. I will be flexible in working with you on scheduling these depositions, however, I would like to have all depositions concluded by July 9th, the date of Dispositive Motions.

Also, please advise, who would be the contact person should we need to file a motion with the Court regarding your client's failure to provide damage documentation? As you know this information is crucial to us being able to defend his claim for millions of dollars in losses Your attention to this matter is appreciated.

/s/ Dean F. Piermattei

Debby McKinney
Secretary to Dean Piermattei, Esq.
and Cory Iannacone, Esq.
Rhoads and Sinon LLP
717-237-6780



Dean F. Piermattei
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dpiermattei@rhoads-sinon.com

FILE NO: 6216.5

June 25, 2007

Re: Stambaugh v. SARAA

Jordan Cunningham, Esquire
Cunningham & Chernicoff, P.C.
2320 N. 2nd Street
Harrisburg, PA 17110

VIA: Hand Delivery

Dear Jordan:

While I understand you are on vacation, you directed me to deal with your associate who will be attending the deposition. I am providing to you, via hand delivery, to your associate, this date, additional documents, some of which you may already have in your possession. This should be considered a formal supplement to our discovery responses. Enclosed are the following:

1. Documents Bates numbered SARAA07168-07287 (will be used as deposition exhibit);
2. A disc containing information relating to building repairs from 1998 – 2007;
3. Areo Contract with SARAA (will be used as deposition exhibit). I believe this is already contained in your client's records, however, I am providing it again for the sake of completeness);
4. requested fuel flowage records for HIA from January 2000 through 2006;

Additionally, you also requested whether any of the Authority's witnesses would be available on Saturday, June 30, 2007. I will be out of town for the holiday weekend, but Heather Kelly from my office is available to defend these depositions. Belinda Svrbely is available, and I am waiting to hear back from Fred Testa. We do not intend to call Tom Peiffer as a witness.

There remain outstanding problems with the documents produced by your client. First, Plaintiff has only produced consolidated financial information for a three year period. However, they have alleged continuing damages. Accordingly, we need all consolidated financials through the present. Moreover, we are still awaiting documentation supporting many of the categories of damages that have been pled in the Second Amended Complaint. You indicated that Mark Stambaugh will be producing additional documents during his deposition today. We will review those, and, to the extent that any deficiencies remain, will seek a conference with Magistrate Smyser.



June 25, 2007

Page 2

Thank you for your prompt attention to the above matters.

Very truly yours,

RHOADS & SINON LLP

By: 
Dean F. Piermattei 

Enclosures



Heather Z. Kelly
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hkelly@rhoads-sinon.com

FILE NO: 6216/5

June 26, 2007

Re: Stambaugh v. SARAA

Jordan D. Cunningham
Cunningham & Chernicoff, P.C.
2320 N. 2nd Street
Harrisburg, PA 17110

**E-MAIL, FACSIMILE (letter only)
& HAND DELIVERY**

Dear Jordan:

This will confirm that you will be taking Belinda Svirbely's deposition at 8:00 a.m. on Saturday June 30, 2007 at our offices. Additionally, we are attempting to reach Fred Testa to determine his availability as well.

Enclosed herewith are Defendants' formal responses to Plaintiff's Interrogatories and Document Requests. The 7,000+ documents that we have already provided contain substantially all of the information that you requested in the Interrogatories. Notwithstanding, for the sake of completeness, we are serving these responses. The one thing that I do want to highlight for you is that, in light of the recent deposition testimony, we are adding Bob Shields as a potential witness.

Finally, it is my understanding that you will contact me later today in order to update the status of Plaintiff's document production related to damages so that we can determine whether it is necessary to contact Magistrate Judge Smyser. I look forward to hearing from you in this regard.

Very truly yours,

RHOADS & SINON LLP

By: *Heather Z. Kelly / HK*
Heather Z. Kelly

Enclosures

cc: Dean Piermattei, Esquire